

STATE OF NEW HAMPSHIRE
EXECUTIVE DEPARTMENT

ORIGINAL
FILE



2. Open, uncoordinated access to the 216-220 MHz Band by the Amateur Service would cause chaos to existing users of the band, including the Automated Maritime Telecommunications Systems (AMTS). Therefore, ARRL's petition for a Secondary, Noninterference allocation in the band seems reasonable, particularly in light of ARRL's suggestion for coordination of any Amateur Service station wishing to use the Band for digital communications (2). Coordination by the ARRL or some other entity should help alleviate, if not eliminate, interference between users in the Amateur Service and those with a Primary allocation.

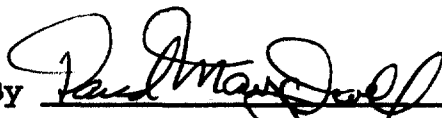
3. Should the Commission move to allocate 216-220 MHz to the Amateur Service, it would help Amateur Radio packet operations here in the State of New Hampshire. New Hampshire and it's neighboring states, Vermont and Maine, are primarily rural with low population densities. There are large areas that are uninhabited that seperate populated areas throughout the three states. Installation of intermediate digital communications stations is difficult, if not impossible, due to legal and/or environmental restrictions. In some cases, sites that are otherwise suitable locations for such digital packet radio systems are, at present, inaccessible due to the remoteness of those sites. One of the few answers to the problem is the use of the long haul propogation characteristics of the 216-220 MHz Band. Those characteristics do not exist on the higher frequency bands (430-450 MHz and up) available to the Amateur Service.

4. Already, it has been necessary to move one vital digital link between New Hampshire and Vermont up into the 222-225 MHz band, causing some interference to an existing remote repeater link co-located with one of the packet switching stations serviced by the digital link. The possibility of using a high speed link on the present frequency is nonexistent due to concerns for causing intolerable interference to the repeater link. Moving up in frequency to the 430-450 MHz Band or higher is not an option due to the difference in propagation of the higher frequency bands. Path reliability between the packet switching stations is poor to nonexistent at higher frequencies. Plans for future expansion of the digital communications network have been delayed due to the loss of 220-222 MHz. Access to the 216-220 MHz Band would allow such future expansion and upgrading of the existing network.

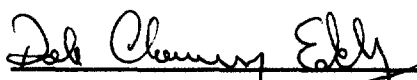
5. In conclusion, we believe that the Commission should move forward in acting on the Petition for Rulemaking filed by the ARRL and take the necessary steps to allocate 216-220 MHz to the Amateur Service as described in the petition.

Respectfully submitted,
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Footnotes

(1) RM-7747 Section II, paragraph 14

(2) RM-7747 Section IV, paragraphs 42, 43, 44

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EXCLUDED FROM AUTOMATIC
DOWNGRADING AND
DECLASSIFICATION